

### State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center 122 S. Front Street Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

07/31/00

08-57-09-1196 U.S. DOE - Mound Plant James Johnson P.O. Box 66 Miamisburg, OH 45343-0066 CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

MIAMISBURG
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Dear James Johnson:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission 236 East Town Street Room 300 Columbus, Ohio 43215

If you have any questions, please contact the RAPCA at (937) 225-4435.

Very truly yours,

Thomas G. Rigo, Manager

Thomas D. This

Field Operations and Permit Section Division of Air Pollution Control

cc: RAPCA

Becky Castle, DAPC PMU



#### PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 07/31/00

Expiration Date: 07/31/05

Facility ID: 08-57-09-1196

FINAL ISSUE

This document constitutes issuance for:

U.S. DOE - Mound Plant P.O. Box 66 Miamisburg, OH 45343-0066

of a permit to operate for:

B001 (Zurn/Erie City)

Boiler No. 1; 84 mmBtu/hr rated input capacity

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

# 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quar terly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

### 6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

#### 7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### 8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### 9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

# 10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

RAPCA 451 West Third Street PO Box 972 Dayton, OH 45422 (937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

Facility ID: 08-57-09-1196 Emissions Unit: Zurn/Erie City (B001)

#### Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
84 mmBtu/hr natural gas and No. 2 fuel oil fired Boiler No.1	3745-17-10 (B)(1)	0.020 pound of particulate emissions per mmBtu actual heat input
	3745-17-07 (A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible.
	3745-35-07	0.51 pound sulfur dioxide (SO2) per mmBtu actual heat input, when burning No. 2 fuel oil, 0.0006 pound of SO2 per mmBtu actual heat input when burning only natural gas, 3.58 TPY SO2, as a rolling 12-month summation;
		0.14 pound nitrogen oxides (NOx) per mmBtu actual heat input, when burning No. 2 fuel oil or natural gas, 8.0 TPY NOx, as a rolling 12-month summation

#### 2. Additional Terms and Conditions

None

#### B. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.
- 2. The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit.

Facility ID: 08-57-09-1196 Emissions Unit: Zurn/Erie City (B001)

#### B. Operational Restrictions (continued)

3. The maximum natural gas usage for this emissions unit shall not exceed 100 million cubic feet per year, based upon a rolling 12-month summation of the monthly consumption rates.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to operate, the permittee shall not exceed the natural gas consumption levels specified in the following table for emissions unit B001:

#### MONTH(S) NATURAL GAS CONSUMPTION (million cubic feet)

1-1	50
1-2	50
1-3	50
1-4	50
1-5	50
1-6	50
1-7	58
1-8	66
1-9	75
1-10	83
1-11	92
1-12	100

After the first twelve months of operation following the issuance of this permit, compliance with the annual natural gas consumption limitation for emissions unit B001 shall be based upon a rolling, 12-month summation of the monthly natural gas consumption rates.

4. The maximum No. 2 fuel oil usage shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of the monthly consumption rates.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to operate, the permittee shall not exceed the No. 2 fuel oil consumption levels specified in the following table for emissions unit B001:

#### MONTH(S) FUEL OIL CONSUMPTION (gallons)

1-1	50,000
1-2	50,000
1-3	50,000
1-4	50,000
1-5	50,000
1-6	50,000
1-7	58,334
1-8	66,667
1-9	74,999
1-10	83,332
1-11	91,665
1-12	100,000

After the first twelve months of operation following the issuance of this permit, compliance with the annual No. 2 fuel oil consumption limitation for emissions unit B001 shall be based upon a rolling, 12-month summation of the monthly No. 2 fuel oil consumption rates.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

Facility ID: 08-57-09-1196 Emissions Unit: Zurn/Erie City (B001)

# C. Monitoring and/or Record Keeping Requirements (continued)

- 2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate in lb(s)/mmBTU. (The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
- 3. The permittee shall maintain monthly records of the following information for emissions unit B001:

a. the No. 2 fuel oil consumption rate, in gallons;

b. the rolling, 12-month summation of No. 2 fuel oil consumption, in gallons;

c. the natural gas consumption rate, in cubic feet; and

d. the rolling, 12-month summation of natural gas consumption, in million cubic feet.

#### D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs to the Director (the appropriate Ohio EPA District Office or local air agency).
- The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas and No. 2 fuel oil consumption rate limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas and No. 2 fuel oil consumption levels for emissions unit B001 specified in Sections B.3 and B.4 of this permit. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous six months (July to December and January to June, respectively). If no deviations occurred during the reporting period, a semi-annual report shall be submitted which states that no deviations occurred during that reporting period.
- 3. The permittee shall submit semi-annual deviation (excursion) reports which identify any exceedances of the sulfur dioxide emission limitation of .51 pound/mmBtu, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous six months (July to December and January to June, respectively). If no deviations occurred during the reporting period, a semi-annual report shall be submitted which states that no deviations occurred during that reporting period.
- The permittee shall submit annual reports that summarize the amounts of natural gas and No. 2 fuel oil consumed in emissions unit B001 and the total sulfur dioxide and nitrogen oxides emissions for emissions unit B001. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year.

#### E. Testing Requirements

- Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a Emission Limitation-0.020 lb particulate/mmBtu actual heat input

Applicable Compliance Method-

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.084 million cu.ft/hr) by the emission factor of 1.9 lbs PM/million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, divided by the maximum hourly heat input capacity of the emissions unit (84 mmBtu/hr). For the use of No. 2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (604 gals/hr) by the emission factor of 2.0 lbs PM/1000 gals given for fuel oil in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3, divided by the maximum hourly heat input capacity of the emissions unit (84 mmBtu/hr).

Facility ID: 08-57-09-1196 Emissions Unit: Zurn/Erie City (B001)

#### E. Testing Requirements (continued)

1.b Emission Limitation-

0.51 lb SO2/mmBtu actual heat input, when burning No. 2 fuel oil

Applicable Compliance Method-

Compliance shall be based upon the record keeping and analysis requirements specified in C.1.and C.2. for each shipment of oil, and the use of the equation contained in OAC rule 3745-18-04(F)(2).

1.c Emission Limitation-

0.0006 lb SO2/mmBtu actual heat input, when burning natural gas

Applicable Compliance Method-

Compliance shall be based upon multiplying the hourly gas capacity of the emissions unit (0.084 million cu.ft/hr) by the emission factor of 0.6 lb SO2/million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, and dividing by the maximum hourly heat input capacity of the emissions unit (84 mmBtu/hr).

1.d Emission Limitation-

0.14 lb NOx/mmBtu actual heat input, when burning No. 2 fuel oil or natural gas

Applicable Compliance Method-

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.084 million cu.ft/hr) by the emission factor of 140 lbs NOx/million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, divided by the maximum hourly heat input capacity of the emissions unit (84 mmBtu/hr). For the use of No. 2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (604 gals/hr) by the emission factor of 20 lbs NOx/1000 gals given for fuel oil in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3, divided by the maximum hourly heat input capacity of the emissions unit (84 mmBtu/hr).

1.e Emission Limitation-

3.58 TPY SO2, as a rolling 12-month summation

Applicable Compliance Method-

i. For the use of natural gas, compliance shall be determined by multiplying the rolling 12-month natural gas usage, in million cubic feet/yr, from section C.3., by the emission factor of 0.6 lbs SO2/million cu.ft given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 and converting to tons.

- ii. For the use of No. 2 fuel oil, compliance shall be determined by multiplying the rolling 12-month No. 2 fuel oil usage, in 1000 gals/yr, from section C.3., by the emission factor of 142(S) = (142)(0.5) = 71 lbs SO2/1000 gals given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 and converting to tons.
- iii. Then sum i. and ii. for the total, in tons.
- 1.f Emission Limitation-

8.0 TPY NOx, as a rolling 12-month summation

Applicable Compliance Method-

i. For the use of natural gas, compliance shall be determined by multiplying the rolling 12-month natural gas usage, in million cu.ft/yr, from section C.3. by the emission factor of 140 lbs NOx/million cu. ft given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 and converting to tons.

- ii. For the use of No. 2 fuel oil, compliance shall be determined by multiplying the rolling 12-month No. 2 fuel oil usage, in 1000 gals/yr, from section C.3. by the emission factor of 20 lbs NOx/1000 gals given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 and converting to tons.
- iii. Then sum i. and ii. for the total, in tons.

Facility ID: 08-57-09-1196 Emissions Unit: Zurn/Erie City (B001)

### E. Testing Requirements (continued)

1.g Emission Limitation-20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible.

Applicable Compliance Method-

Compliance with the visible emission limitation is presumed through the use of inherently clean fuels. If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

#### F. Miscellaneous Requirements

- The terms and conditions in sections A, B, C, D, E and F of this permit are federally enforceable, pursuant to OAC 3745-35-07.
- 2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.



#### PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 07/31/00

Expiration Date: 07/31/05

Facility ID: 08-57-09-1196

FINAL ISSUE

This document constitutes issuance for:

U.S. DOE - Mound Plant P.O. Box 66 Miamisburg, OH 45343-0066

of a permit to operate for:

B006 (Clever-Brooks/Coen)
Boiler No. 2; 103 mmBtu/hr rated input capacity

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

# 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quar terly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

### 6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

#### 7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### 8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### 9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

# 10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

RAPCA 451 West Third Street PO Box 972 Dayton, OH 45422 (937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

Facility Name: U.S. DOE - Mound Plant 08-57-09-1196

Facility ID:

Emissions Unit: Clever-Brooks/Coen (B006)

### Part II: Special Terms and Conditions

# Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
103 mmBtu/hr natural gas and No. 2 fuel oil fired Boiler No.2	3745-17-10 (B)(1)	0.020 pound of particulate emissions per mmBtu actual heat input
	3745-17-07 (A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible.
	3745-35-07	0.51 pound sulfur dioxide (SO2) per mmBtu actual heat input, when burning No. 2 fuel oil, 0.0006 pound of SO2 per mmBtu actual heat input when burning only natural gas, 17.84 TPY SO2, as a rolling 12-month summation;
		0.14 pound nitrogen oxides (NOx) per mmBtu actual heat input, when burning No. 2 fuel oil or natural gas, 26.0 TPY NOx, as a rolling 12-month summation

#### 2. Additional Terms and Conditions

None

#### B. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with 1. the allowable sulfur dioxide emission limitation specified in section A.1. above.
- The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit. 2.

Facility ID: 08-57-09-1196

Emissions Unit: Clever-Brooks/Coen (B006)

#### B. Operational Restrictions (continued)

3. The maximum natural gas usage for this emissions unit shall not exceed 300 million cubic feet per year, based upon a rolling 12-month summation of the monthly consumption rates.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to operate, the permittee shall not exceed the natural gas consumption levels specified in the following table for emissions unit B006:

# MONTH(S) NATURAL GAS CONSUMPTION (million cubic feet)

1-1	150	1,10043
1-2	150	[M: M]
1-3	150	11.1
1-4	150	
1-5	150	
1-6	150	
1-7	175	
1-8	200	
1-9	225	
1-10	250	
1-11	275	
1-12	300	

After the first twelve months of operation following the issuance of this permit, compliance with the annual natural gas consumption limitation for emissions unit B006 shall be based upon a rolling, 12-month summation of the monthly natural gas consumption rates.

The maximum No. 2 fuel oil usage shall not exceed 500,000 gallons per year, based upon a rolling, 12-month summation of the monthly consumption rates.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to operate, the permittee shall not exceed the No. 2 fuel oil consumption levels specified in the following table for emissions unit B006:

### MONTH(S) FUEL OIL CONSUMPTION (gallons)

4 4		
1-1		250,000
1-2		
		250,000
1-3		250,000
1-4		250,000
		230,000
1-5		250,000
1-6		250,000
		230,000
1-7		291,666
1-8		333,333
1-9		375,000
1-10		416,666
		410,000
1-11		458,333
1-12		
1-12		500,000

After the first twelve months of operation following the issuance of this permit, compliance with the annual No. 2 fuel oil comsumption limitation for emissions unit B006 shall be based upon a rolling, 12-month summation of the monthly No. 2 fuel oil consumption rates.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

Facility ID: 08-57-09-1196

Emissions Unit: Clever-Brooks/Coen (B006)

# C. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate in lb(s)/mmBTU. (The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

- 3. The permittee shall maintain monthly records of the following information for emissions unit B006:
  - a. the No. 2 fuel oil consumption rate, in gallons;
  - b. the rolling, 12-month summation of No. 2 fuel oil consumption, in gallons;

c. the natural gas consumption rate, in cubic feet; and

d. the rolling, 12-month summation of natural gas consumption, in million cubic feet.

#### D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs to the Director (the appropriate Ohio EPA District Office or local air agency).
- The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas and No. 2 fuel oil consumption rate limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas and No. 2 fuel oil consumption levels for emissions unit B006 specified in Sections B.3 and B.4 of this permit. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous six months (July to December and January to June, respectively). If no deviations occurred during the reporting period, a semi-annual report shall be submitted which states that no deviations occurred during that reporting period.
- 3. The permittee shall submit semi-annual deviation (excursion) reports which identify any exceedances of the sulfur dioxide emission limitation of .51 pound/mmBtu, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous six months (July to December and January to June, respectively). If no deviations occurred during the reporting period, a semi-annual report shall be submitted which states that no deviations occurred during that reporting period.
- The permittee shall submit annual reports that summarize the amounts of natural gas and No. 2 fuel oil consumed in emissions unit B001 and the total sulfur dioxide and nitrogen oxides emissions for emissions unit B001. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year.

#### E. Testing Requirements

- Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a Emission Limitation-0.020 lb particulate/mmBtu actual heat input

Applicable Compliance Method-

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.103 million cu.ft/hr) by the emission factor of 1.9 lbs PM/ million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, divided by the maximum hourly heat input capacity of the emissions unit (103 mmBtu/hr). For the use of No. 2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (741 gals/hr) by the emission factor of 2.0 lbs PM/1000 gals given for fuel oil in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3, divided by the maximum hourly heat input capacity of the emissions unit (103 mmBtu/hr).

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Emissions Unit: Clever-Brooks/Coen (B006)

### E. Testing Requirements (continued)

1.b Emission Limitation-

0.51 lb SO2/mmBtu actual heat input, when burning No. 2 fuel oil

Applicable Compliance Method-

Compliance shall be based upon the record keeping and analysis requirements specified in C.1. and C.2. for each shipment of oil, and the use of the equation contained in OAC rule 3745-18-04(F)(2).

1.c Emission Limitation-

0.0006 lb SO2/mmBtu actual heat input, when burning natural gas

Applicable Compliance Method-

Compliance shall be based upon multiplying the hourly gas capacity of the emissions unit (0.103 million cu.ft/hr) by the emission factor of 0.6 lb SO2/million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, and dividing by the maximum hourly heat input capacity of the emissions unit (103 mmBtu/hr).

1.d Emission Limitation-

0.14 lb NOx/mmBtu actual heat input, when burning No. 2 fuel oil or natural gas

Applicable Compliance Method-

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.103 million cu.ft/hr) by the emission factor of 140 lbs NOx/million cu.ft given for natural gas in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, divided by the maximum hourly heat input capacity of the emissions unit (103 mmBtu/hr). For the use of No. 2 fuel oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (741 gals/hr) by the emission factor of 20 lbs NOx/1000 gals given for fuel oil in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3, divided by the maximum hourly heat input capacity of the emissions unit (103 mmBtu/hr).

1.e Emission Limitation-

17.84 TPY SO2, as a rolling 12-month summation

Applicable Compliance Method-

i. For the use of natural gas, compliance shall be determined by multiplying the rolling 12-month natural gas usage, in million cubic feet/yr, from section C.3. by the emission factor of 0.6 lbs SO2/million cu.ft given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 and converting to tons.

- ii. For the use of No. 2 fuel oil, compliance shall be determined by multiplying the rolling 12-month No. 2 fuel oil usage, in 1000 gals/yr, from C.3. by the emission factor of 142(S) = (142)(0.5) = 71 lbs/1000 gals given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 and converting to tons.
- iii. Then sum i. and ii. for the total, in tons.
- 1.f Emission Limitation-

26.0 TPY NOx, as a rolling 12-month summation

Applicable Compliance Method-

- i. For the use of natural gas, compliance shall be determined by multiplying the rolling 12-month natural gas usage, in million cu.ft/yr, from section C.3. by the emission factor of 140 lbs NOx/million cu. ft given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 and converting to tons.
- ii. For the use of No. 2 fuel oil, compliance shall be determined by multiplying the rolling 12-month No. 2 fuel oil usage, in 1000 gals/yr, from section C.3. by the emission factor of 20 lbs NOx/1000 gals given in the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 and converting to tons.
- iii. Then sum i. and ii. for the total, in tons.